

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene
Pride Alliance; Extragrams, LLC; 360
Queen Entertainment LLC; Brigitte
Bandit,

Plaintiffs,

v.

Civil Action No. 4:23-cv-02847

Angela Colmenero, in an official
capacity as Interim Attorney General of
Texas; The Woodlands Township;
Montgomery County, Texas; Brett
Ligon, in an official capacity as District
Attorney of Montgomery County; City
of Abilene, Texas; Taylor County,
Texas; James Hicks, in an official
capacity as District Attorney of Taylor
County; Delia Garza, in an official
capacity as County Attorney of Travis
County; Joe D. Gonzales, in an official
capacity as District Attorney of Bexar
County,

Defendants.

**JOINT NOTICE OF STIPULATION OF DISMISSAL OF THE
WOODLANDS TOWNSHIP**

Defendant The Woodlands Township has represented that it does not have any enforcement authority under Senate Bill 12 because it is not a “municipality” within the scope of the Texas Local Government Code that Senate Bill 12 seeks to amend. *See* Dkt. 40 (Defendant The Woodlands Township’s Motion to Dismiss). Without taking a position on this legal representation, Plaintiffs The Woodlands Pride, Inc.; Abilene Pride Alliance; Extragrams, LLC; 360 Queen Entertainment LLC; and Brigitte Bandit (collectively, “Plaintiffs”) consent to dismiss The Woodlands Township without prejudice.

Plaintiffs and Defendant The Woodlands Township therefore notify the Court that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs’ claims against The Woodlands Township are hereby dismissed without prejudice.

Respectfully submitted,

/s/Brian Klosterboer

Brian Klosterboer, *attorney-in-charge*

TX Bar No. 24107833

SDTX No. 3314357

Chloe Kempf

TX Bar No. 24127325

SDTX No. 3852674

Thomas Buser-Clancy

TX Bar No. 24078344

SDTX No. 1671940

Edgar Saldivar

TX Bar No. 24038188

SDTX No. 618958

Adriana Pinon

TX Bar No. 24089768

SDTX No. 1829959

ACLU FOUNDATION OF TEXAS, INC.

P.O. Box 8306

Houston, TX 77288

Tel. (713) 942-8146

Fax (713) 942-8966

bklosterboer@aclutx.org

ckempf@aclutx.org

tbuser-clancy@aclutx.org

esaldivar@aclutx.org

apinon@aclutx.org

Attorneys for Plaintiffs

Derek McDonald

TX Bar No. 00786101

SDTX No. 18546

Maddy Dwertman

TX Bar No. 24092371

SDTX No. 3853795

BAKER BOTTS L.L.P.

401 S. 1st Street, Suite 1300

Austin, TX 78704

Tel. (512) 322-2500

Fax (512) 322-2501

Derek.McDonald@BakerBotts.com

Maddy.Dwertman@BakerBotts.com

Brandt Thomas Roessler

TX Bar No. 24127923

SDTX No. 3853796

BAKER BOTTS L.L.P.

30 Rockefeller Plaza

New York, NY 10112

Tel. (212) 408-2500

Fax (212) 408-2501

Brandt.Roessler@BakerBotts.com

Ali Andrews

TX Bar No. 24059381

SDTX No. 2247339

Emily Rohles

TX Bar No. 24125940

SDTX No. 3715273

BAKER BOTTS L.L.P.

910 Louisiana Street

Houston, TX 77002

Tel. (713) 229-1533

Fax (713) 229-2833

Ali.Andrews@BakerBotts.com

Emily.Rohles@BakerBotts.com

/s/ Ramón G. Viada III
Ramón G. Viada III
State Bar No. 20559350
Fed I.D. No. 10689
rayviada@viadastrayer.com
17 Swallow Tail Court
The Woodlands, Texas 77381
281-419-6338

Counsel for Defendants The Woodlands
Township and City of Abilene

CERTIFICATE OF SERVICE

The undersigned certifies that on the 24th day of August, 2023, a true and correct copy of the above document was served via the CM/ECF system to all counsel of record.

/s/Brian Klosterboer
Brian Klosterboer